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Attorneys for Defendant
Muhammad Assad Iqbal

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
PARAMOUNT PHARMACY GROUP LLC,

Plaintiff,

-against-

MUHAMMAD ASSAD IQBAL

Defendant.
-----X

Case No.:

Notice of Removal

Jury Trial Demanded

NOTICE OF REMOVAL

PLEASE TAKE NOTICE THAT, pursuant to 28 U.S.C. §1441 and 28 U.S.C. §1446, Defendant Muhammad Assad Iqbal (“Defendant” and/or “Iqbal”) hereby removes the above-captioned action to this Court from the Supreme Court of the State of New York, County of Westchester.

1. Iqbal is the defendant in the civil action brought on May 30, 2025 in the Supreme Court of the State of New York, County of Westchester (Index No.: 64381/2025).

GROUND FOR REMOVAL

2. This case is removable under 28 U.S.C. §1441(a) because this is an action of a civil nature in which the District Courts of the United States have been given original jurisdiction under 28 U.S.C. §1332. The amount in controversy exceeds \$75,000, exclusive of interest and costs, and there is complete diversity between the plaintiff, Paramount Pharmacy Group LLC

(“Plaintiff” and/or “Paramount”)¹ and Defendant, in this is action, because Plaintiff, a duly registered business, organized pursuant to the Laws of the State of New Jersey (Ex. A ¶ 1), is a citizen of New Jersey, located at 377 Hoes Lane, Suite 105, Piscataway, New Jersey 08854, and Defendant is a citizen of New York, who resides at 2 Stubbe Drive, Stony Point, New York 10980. Specifically, Plaintiff’s principal claim for relief concerns declaratory judgment and equitable relief (*Id.* ¶¶ 49-61); conversion (*Id.* ¶¶ 62-68); breaches of contract (*Id.* ¶¶ 69-78); tort of interference with contract (*Id.* ¶¶ 79-84); and damages alleged to be in excess of \$2,400,000 (*Id.* at 12).

3. Plaintiff’s verified petition was filed on May 30, 2025 . This notice of removal is filed within 30 days of the filing of the verified petition and is therefore timely under 28 U.S.C. §1446(b).
4. Pursuant to 28 U.S.C. §1446(a), Defendant attaches to this notice the following papers, which are all of the process, pleadings, and orders filed prior to removal of this action:
 - (a) Verified Petition (NYSCEF Doc. No. 1), attached hereto as Exhibit A.
 - (b) Proposed Order to Show Cause – Accompanying Commencement Documents (NYSCEF Doc. No. 2), attached hereto as Exhibit B.
 - (c) Memorandum of Law in Support (NYSCEF Doc. No. 3), attached hereto as Exhibit C.
 - (d) Emergency Affirmation (NYSCEF Doc. No. 4), attached hereto as Exhibit D.
 - (e) Promissory Note (Redacted) – Exhibit 1 (NYSCEF Doc. No. 5), attached hereto as Exhibit E.
 - (f) Security Agreement (Redacted) – Exhibit 2 (NYSCEF Doc. No. 6), attached hereto as Exhibit F.

¹ Upon information and belief, there is complete diversity of citizenship between Defendant and all members of Plaintiff LLC.

- (g) Escrow Agreement (Redacted) – Exhibit 3 (NYSCEF Doc. No. 7), attached hereto as Exhibit G.
- (h) Management Services Agreement (Redacted) – Exhibit 4 (NYSCEF Doc. No. 8), attached hereto as Exhibit H.
- (i) Letter Notice to Respondent (4/29/2025) – Exhibit 5 (NYSCEF Doc. No. 9), attached hereto as Exhibit I.
- (j) Affidavit of Default/Breach – Exhibit 6 (NYSCEF Doc. No. 10), attached hereto as Exhibit J.
- (k) Letter to Respondent (5/8/2025) – Exhibit 7 (NYSCEF Doc. No. 11), attached hereto as Exhibit K.
- (l) Letter-Demand to Respondent (5/13/2025) – Exhibit 8 (NYSCEF Doc. No. 12), attached hereto as Exhibit L.
- (m) RJJ -Re: Order to Show Cause (NYSCEF Doc. No. 13), attached hereto as Exhibit M.
- (n) Addendum – Commercial Division (840C) (NYSCEF Doc. No. 14), attached hereto as Exhibit N.
- (o) Letter/Correspondence from Court (NYSCEF Doc. No. 15), attached hereto as Exhibit O.
- (p) Proposed Preliminary Conference Order (NYSCEF Doc. No. 16), attached hereto as Exhibit P.
- (q) Letter/Correspondence to Judge (with Proof of Service) (NYSCEF Doc. No. 17), attached hereto as Exhibit Q.

Dated: June 6, 2025
Garden City, New York

Respectfully submitted,

SURILAW PLLC

By: 

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